To: Jackson, Scott[Jackson.Scott@epa.gov]; Bohan, Suzanne[bohan.suzanne@epa.gov]; Daly,

Carl[Daly.Carl@epa.gov] **From:** Fay, Kate

**Sent:** Thur 3/7/2013 8:37:23 PM

Subject: Re: Gen. Conf. comments on NPL

;;;;Carl

Could we meet next week to discuss?

From: Jackson, Scott

**Sent:** Thursday, March 07, 2013 12:19:17 PM

To: Distler, Kenneth; Bohan, Suzanne; Fay, Kate; Daly, Carl; Russ, Timothy; Razzazian, Christopher

Subject: Gen. Conf. comments on NPL

All:

Myself, Carl and Tim met with WYDEQ this morning to gather more information about their drill rig engine permits that have been issued in the UGRB ozone nonattainment area.

## Ex. 5 - Deliberative Process

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In addition, the general conformity

exemption regs. state that the exemption is only available for **stationary** sources. WYDEQ's drill rig permits do not consider drill rigs as stationary.

Without going any further into the weeds here, in talking with WYDEQ on the call today, their position is that their drill rig permits are suitable for an exemption from general conformity.

### Ex. 5 - Deliberative Process

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Typically, **stationary sources** that are permitted by the State in the Upper Green River Basin (UGRB) ozone nonattainment area, are permitted under WAQSR Chapter 6 and the State's 2008 Interim Policy for sources in the UGRB. In order to meet the requirements of WAQSR Chapter 6 and the 2008 Interim Policy, the permit requestor typically elects to fully offset the emissions from the stationary source.

## Ex. 5 - Deliberative Process

Thanks,
Scott

Scott Jackson, Unit Chief

Indoor Air, Toxics and Transportation Unit U.S. EPA Region 8

1595 Wynkoop Street (8P-AR)

Denver, Colorado 80202-1129

(303) 312-6107